

AML Policy

1. General Provisions Salient Investment LLC (hereinafter referred to as the “Company”) strives to maintain high standards in combating money laundering (AML) and countering the financing of terrorism (CFT). The Company takes necessary measures to ensure that Clients, Investors, Agents, Intermediaries, and other entities involved in the business are not engaged in various forms of illegal activities, including but not limited to: money laundering, financing terrorism, proliferation of weapons of mass destruction, purchase and sale of narcotics, extortion, smuggling, concealing corruption schemes, tax evasion, and cybercrime.

This policy provides general information to potential or existing Clients of the Company and defines the Company’s general obligations regarding Client verification and measures taken to identify and prevent money laundering and terrorist financing. Before registering a trading account on the platform, the Client confirms that they have read and agreed to the Company’s Anti-Money Laundering Policy and the List of Prohibited Jurisdictions.

2. Definition of Anti-Money Laundering (AML) Anti-Money Laundering (AML) refers to a set of measures, procedures, and legislative acts aimed at identifying and preventing attempts to convert illegally obtained funds into legal assets. Concealing the source of funds from financial regulators or law enforcement agencies is considered a financial crime and entails serious consequences.

One of the results of the rapid development of the financial industry has been the creation of legal acts and laws aimed at combating money laundering. These internationally recognized measures have made it difficult for companies and individuals involved in illegal activities to operate due to regulatory and law enforcement scrutiny.

3. Anti-Money Laundering and Counter-Terrorist Financing Policy Adopted by Salient Investment LLC The Company fully complies with the laws, statutes, and regulations of the Cook Islands aimed at combating money laundering and terrorist financing. Detailed information on these laws and regulations can be found on the Cook Islands Financial Supervisory Commission (FSC) website. Money laundering and terrorist financing are criminal offenses under the applicable laws of the Cook Islands.

In accordance with the Financial Transactions Reporting Act 2017 (FTRA), the Company has developed the following Anti-Money Laundering and Counter-Terrorist Financing Program (hereinafter referred to as the “AML Program”).

3.1 Establishment of the Anti-Money Laundering Department (AML/Compliance Department) The Anti-Money Laundering Department oversees compliance with the AML Program of Salient Investment. The Anti-Money Laundering Department is responsible for:

- Developing, implementing, and updating internal anti-money laundering policies in accordance with the FTRA.
- Training Company employees to identify suspicious financial transactions.

- Assisting the Financial Intelligence Unit in identifying and preventing suspicious financial activities.
- Informing the Board of Directors and senior management of the Company about AML Program compliance and financial risks.
- Verifying and monitoring the Company's Clients.

The Anti-Money Laundering Department is headed by a senior AML specialist (MLRO) appointed by the Board of Directors.

3.2 Mandatory Know Your Customer (KYC) Policy The Know Your Customer (KYC) policy is a mandatory procedure for verifying the Client's identity. It helps protect the interests of Clients and the Company by minimizing the risk of illegal activities. According to current legislation, financial institutions are prohibited from opening anonymous trading accounts.

The KYC procedure includes, but is not limited to, verifying the following Client information:

1. Authenticity of documents.
2. Authenticity of personal data.
3. Email addresses and phone numbers.
4. Country of residence.

The Company reserves the right to request additional information to complete the KYC procedure if necessary. Providing incomplete or inaccurate information by the Client may result in refusal or termination of services. Client verification is carried out by providing documents electronically through a third-party service provider.

Confidential information collected by the Company may be disclosed to a third party only if the request for such information is made in accordance with applicable law. Questions related to the KYC procedure should be sent to info@salientinvestment.com.

3.3 Automated Risk Assessment System The Company uses an automated risk assessment system to detect unreliable Clients and high-risk transactions. The Company reserves the right to configure and modify the risk assessment system as necessary. The Anti-Money Laundering Department regularly monitors Clients flagged by the risk assessment system.

To ensure security, the Company does not provide open access to information about the risk assessment system and the Company's internal procedures. Based on data analysis, the Anti-Money Laundering Department assesses risks and takes necessary measures.

3.4 Informing Company Employees about the Anti-Money Laundering Policy The AML policy applies not only to criminals attempting to legalize illegally obtained funds but also to employees of financial institutions involved in monitoring and processing transactions.

The Anti-Money Laundering Department regularly informs Company employees about AML guidelines and conducts training aimed at identifying suspicious patterns used by organizations and individuals to launder money. If a Company employee suspects misconduct based on AML guidelines and this Policy while processing transactions, they

should report it to their department head and the Anti-Money Laundering Department for further investigation.

3.5 Politically Exposed Persons (PEP) Provisions The term “Politically Exposed Person” (PEP) in the context of this Policy is defined in accordance with section 3 of the Financial Transactions Reporting Act (FTRA) and includes:

1. An individual holding a prominent public position within a country or internationally.
2. Family members and partners of such an individual, as defined by the FTRA.

A Client who is a Politically Exposed Person (PEP) must provide the Anti-Money Laundering Department with copies of documents confirming this status. Copies of documents should be sent to info@salientinvestment.com before registering a trading account on the platform. Each case of conducting business relationships with Politically Exposed Persons (PEPs) is discussed privately between the interested parties in accordance with applicable law. The Company is required by law to obtain information about Politically Exposed Persons (PEPs) using its services. The Company reserves the right to use third-party services to confirm the PEP status and request additional information if necessary.

3.6 Sanctioned Persons Provisions Salient Investment LLC does not provide services to sanctioned persons. A “sanctioned person” within the framework of this Policy means any individual or entity included in any related sanctions list, including but not limited to the following:

- Consolidated List of OFAC Sanctions (non-SDN).
- Specially Designated Nationals and Blocked Persons List (SDN) by OFAC.
- Interpol notices.
- Consolidated List of Financial Sanctions by the EU.
- Lists of terrorist organizations and unauthorized associations by Israel.
- UN Security Council Consolidated List.
- Other sanctioned persons lists.

Potential Clients included in the sanctioned persons list are prohibited from registering trading accounts on the platform. Clients whose sanction status has been updated, resulting in their inclusion in any sanctions list, must immediately report this to info@salientinvestment.com.

The Company reserves the right to use third-party services to identify and confirm the status of sanctioned Clients and may request additional information if deemed necessary.

4. Storage of Personal Data The Company reserves the right to store and process personal data obtained during the identification, verification, and financial transactions of Clients, including but not limited to:

1. Information provided by the Client for identity verification.
2. Methods used for depositing and withdrawing funds.
3. Information about the Client obtained from publicly available databases.
4. Any discrepancies arising during the Client’s identity verification process.

The Company retains personal data in English for six years from the date of the last financial activity in the Client's account or its closure. The Company also retains information about suspicious Client activity for six years.

Questions related to Salient Investment LLC's Anti-Money Laundering and Counter-Terrorist Financing (AML/CFT) measures or this Policy should be directed to info@salientinvestment.com.